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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)	
)	Case No.: 2:19-cr-00072-JCM-BNW
Plaintiff,)	
)	STIPULATION TO CONTINUE THE
vs.)	CHANGE OF PLEA DATE
)	(Second Request)
TERRY TETSUO TAKIMOTO,)	
)	
Defendant.)	
)	

IT IS HEREBY STIPULATED AND AGREED, by and between NICHOLAS A. TRUTANICH, United States Attorney, CHRISTOPHER LIN, Assistant United States Attorney, counsel for the United States of America and JOHN GEORGE, Esq., counsel for defendant Takimoto:

THAT THE CHANGE OF PLEA CURRENTLY SCHEDULED FOR April 24, 2020, at 10:00 a.m. be continued and reset no earlier than 30 days if convenient for the Court.

1. On March 16, 2020, the Chief Judge of the U.S. District Court for the District of Nevada issued Temporary General Order 2020-03, which found that due to the outbreak of the coronavirus disease 2019 ("COVID-2019") in the District of

1 Nevada, the declaration by the Governor of the State of Nevada of a public health
2 emergency due to the spread of COVID-19 in Nevada, and the declaration of local
3 emergencies by local governments due to COVID-19, including Clark County, the
4 Court has sustained “reduced ability to obtain an adequate spectrum of jurors,” and
5 it noted the effects of public health recommendations, including “social distancing
6 measures.” General Order 2020-03 accordingly continued all civil and criminal
7 trials until April 10, 2020, pending further order of the Court and found that “the
8 ends of justice are best served by ordering the continuances, which outweighs the
9 best interests of the public and any defendant’s right to a speedy trial under 18
10 U.S.C. § 3161(h)(7)(A).”

11 2. On March 19, 2020, the Chief Judge of the U.S. District Court for the
12 District of Nevada issued Temporary General Order 2020-04 (collectively with
13 General Order 2020-03, “the General Orders”), which noted that “the COVID-19
14 pandemic has continued to spread,” resulting in the need for “more aggressive
15 social-distancing measures.” The Court noted further that, “[o]n March 17, 2020,
16 the Governor of the State of Nevada ordered the closure of many business
17 establishments and strongly encouraged all citizens to stay home.” Accordingly, the
18 Court ordered the temporary closure of the Clerk’s office, and implemented other
19 changes, including “striving to eliminate in-person court appearances.” In the event
20 any hearing must go forward, the Court will conduct the hearing via video or
21 teleconference. The Court will vacate or amend GO 2020-04 no later than April 30,
22 2020.

1 3. On April 9, 2020, the Chief Judge of the U.S. District Court for the District
2 of Nevada issued an Amendment to the Temporary General Order 2020-03 further
3 continuing criminal trials past April 10, 2020.

4 In light of the ongoing health concerns surrounding the COVID-19 virus, counsel
5 for defendant and counsel for the Government agree to this continuance. This continuance
6 is not sought for the purpose of delay but to adhere to recommendations related to
7 prevention of COVID-19. The defendant agrees to this continuance. No prejudice to the
8 defendant will occur because of this continuance.

9 This is the second request for a continuance of the change of plea date.

10 DATED this 10th day of April, 2020.

11
12 NICHOLAS A. TRUTANICH
 United States Attorney

13 /s/ Christopher Lin
14 CHRISTOPHER LIN
 Assistant United States Attorney

15
16 /s/ John George
17 JOHN GEORGE, Esq.
 Counsel for Defendant TAKIMOTO

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ORDER

VS.

Defendant.

DATED April 13, 2020.

UNITED STATES DISTRICT JUDGE